

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FRED L. NANCE, JR.,

Plaintiff,

v.

DEPARTMENT OF JUSTICE,  
BUREAU OF JUSTICE ASSISTANCE,  
OFFICE OF JUSTICE PROGRAMS,  
EMAGES, INC., HATTIE WASH,  
THOMAS BRADLEY, *et al.*,

Defendants.

Case No. 20-cv-06316

Hon. Jorge L. Alonso  
Magistrate Judge Beth W. Jantz

**DEFENDANTS, EMAGES, INC., HATTIE WASH, AND THOMAS BRADLEY'S  
UNOPPOSED MOTION FOR EXTENSION OF TIME**

Defendants, Emages, Inc., Hattie Wash, in her capacity as chief executive officer of Emages, Inc., and Thomas Bradley, in his capacity as an employee of Emages, Inc., respectfully request an extension of time to Friday, January 29, 2021, to respond to Plaintiff's Complaint. In support thereof, the defendants state as follows:

1. Plaintiff, Fred L. Nance, Jr. ("Plaintiff"), filed his Complaint on October 26, 2020. *See* Dkt. 5.
2. On November 13, 2020, an appearance was filed on behalf of Defendants, Emages, Inc. and Hattie Wash. *See* Dkt. 7.
3. On December 23, 2020, prior to the filing of the present motion, undersigned counsel filed an appearance on behalf of Defendant, Thomas Bradley. *See* Dkt. 19.
4. Defendants, Emages, Inc. and Hattie Wash, previously filed a motion for extension of time. *See* Dkt. 11. On November 20, 2020, the Court granted the defendants' motion. *See* Dkt. 13.

5. Defendants, Emages, Inc. and Hattie Wash's response to the Complaint are currently due December 23, 2020. Both defendants seek an extension of this deadline.

6. On November 23, 2020, Plaintiff filed a Motion for Default directed towards Defendant, Thomas Bradley ("Motion for Default"). *See* Dkt. 14. The Motion for Default was denied. *See* Dkt. 15.

7. On December 1, 2020, Plaintiff filed a Declaration in Support of Motion for Default Judgment against Defendant, Thomas Bradley ("Declaration"), in which Plaintiff again asks for Mr. Bradley to be held in default. *See* Dkt. 16.

8. On December 21, 2020, counsel for Defendant, Thomas Bradley, spoke with Plaintiff and Plaintiff agreed to withdraw any and all motions directed against Mr. Bradley.

9. To the extent Plaintiff's Declaration is being considered by the Court, defendants submit that Plaintiff's request for default has been withdrawn.

10. Defendants, Emages, Inc., Hattie Wash, and Thomas Bradley intend to file a coordinated and joint response to the Complaint and have been working with counsel towards that goal.

11. In addition, in mid-January 2021, the defendants expect to receive documents and information that will inform their response to the Complaint. The requested extension is necessary for the defendants to coordinate their response and to allow the defendants sufficient time to consult and confer with counsel regarding the new information.

12. The Federal Rules of Civil Procedure provide that "when an act may or must be done within a specified time, the court may, for good cause, extend the time" to act. Fed. R. Civ. P. 6(b). The defendants' request demonstrates good cause.

13. On December 21, 2020, counsel for the defendants communicated with Plaintiff regarding the present motion and request. Plaintiff does not object to an extension of time and has agreed to allow an extension through January 29, 2021.

14. The defendants' motion for extension of time is made in good faith, for good cause, and not for the purpose of delay. Furthermore, the extension of time requested will not prejudice the parties and will likely add efficiency to the pleadings process.

WHEREFORE, Defendants, Emages, Inc., Hattie Wash, and Thomas Bradley, request that the Court enter an order (i) allowing each defendant an extension to January 29, 2021 to respond to the Complaint; (ii) acknowledging that any and all motions seeking default of Defendant, Thomas Bradley are withdrawn; and (iii) granting such additional relief as the Court deems fair, appropriate, and just. A proposed order is attached as Exhibit A.

Dated: December 23, 2020

Respectfully submitted,

**EMAGES, Inc., Hattie Wash, and Thomas  
Bradley**

By: s/Derrick M. Thompson Jr.  
One of their Attorneys

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# EXHIBIT A

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**[PROPOSED] ORDER**

For good cause shown, Defendants, Emages, Inc., Hattie Wash, and Thomas Bradley's Unopposed Motion for Extension of Time is GRANTED and all requests seeking default of Thomas Bradley are hereby withdrawn. The defendants' deadline to respond to Plaintiff's Complaint shall be extended to January 29, 2021.

SO ORDERED on this \_\_\_\_ day of \_\_\_\_\_, 2020.

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Honorable Jorge L. Alonso  
U.S. District Judge for the Northern District of  
Illinois